

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

**IN RE GRAND JURY SUBPOENA ISSUED BY
A GRAND JURY IN THE SOUTHERN
DISTRICT OF NEW YORK SERVED UPON
JORDAN MEADOW**

TO BE FILED IN PART 1

**DECLARATION OF
IRA LEE SORKIN**

MOTION TO QUASH GRAND JURY SUBPOENA

IRA LEE SORKIN, ESQ., makes the following declaration, under the penalty of perjury pursuant to 28 U.S.C. §1746, that the following is true and correct:

1. I am a partner in the firm of Mintz & Gold LLP, counsel to Jordan Meadow (“Meadow”). I make this Declaration in support of Meadow’s motion to quash the Grand Jury Subpoena (the “Subpoena”) issued by the Southern District of New York to Spartan Capital Securities, LLC (“Spartan”), c/o Jordan Meadow as the custodian of records.
2. Pursuant to Federal Rule of Criminal Procedure 17(c)(2), the court may quash a subpoena if compliance would be unreasonable or oppressive.
3. An individual who is served a subpoena as the custodian of records for a corporation can be excused from compliance with the subpoena if the individual can demonstrate he or she is not the custodian of the requested records. (*See, In re Eight Grand Jury Subpoenae Duces Tecum*, 701 F Supp 53, 57 (SDNY 1988).
4. The subpoenaed corporation should be permitted to designate the specific custodian to produce the subpoenaed documents. (*See, In re Two Grand Jury Subpoenae Duces Tecum*, 769 F2d 52, 57 (2d Cir 1985).
5. On May 17, 2023, the Subpoena was served upon Meadow, calling for his appearance before the Grand Jury in the Southern District of New York on May 30, 2023 and for the production of records and documents in the possession, custody, or control of Spartan.

6. The Subpoena identifies the materials to be produced to include any and all records and documents pertaining to twelve different entities, some of which are publicly traded on various stock exchanges.

7. The Subpoena also calls for the production of any and all records and documents pertaining to five individuals who are not employees or clients of Spartan.

8. Meadow is employed as a Securities Broker by Spartan.

9. I have been advised by Spartan's counsel David Schrader, a partner at Paykin, Krieg, & Adams LLP, that Meadow is not, nor ever has been the custodian of records of Spartan.

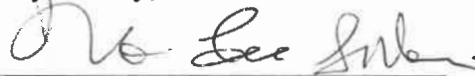
10. Meadow does not, nor ever has had access to Spartan's proprietary records.

11. Attached as Exhibit 1 is a true and correct copy of the Subpoena served upon Meadow.

12. Attached as Exhibit 2 is a true and correct copy of Meadow's Affidavit.

13. For all the foregoing reasons, Meadow respectfully requests that the Court quash the Subpoena.

Executed in New York, New York on this 24th day of May, 2023.



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